

Respectfully submitted,

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COUNSEL FOR THE PLAINTIFFS

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the Receiver and OSIC conferred with counsel for defendant Greenberg Traurig LLP ("Greenberg") concerning the relief requested in this motion. Greenberg agrees to the entry of a scheduling order, but does not agree to the deadlines proposed in Exhibit A.

/s/ Edward C. Snyder

Edward C. Snyder

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of March 2018, I electronically filed the foregoing document with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Joshua E. Abraham
Joshua E. Abraham

Exhibit A

extensions of these deadlines. Motions may become moot due to trial if filed after the deadline in this Order.

- a. March 4, 2019 – Plaintiffs must disclose experts pursuant to Rule 26(a)(2);
- b. April 8, 2019 – Defendant’s disclosure of opposing experts pursuant to Rule 26(a)(2);
- c. April 30, 2019 – Plaintiffs’ disclosure of rebuttal experts pursuant to Rule 26(a)(2) or supplementation with rebuttal opinions pursuant to Rule 26(e)(1);
- d. May 30, 2019 – merits discovery closes; all discovery requests must be served in time to permit responses by this date;
- e. June 30, 2019 – expert discovery closes.
- f. June 30, 2019 - mediation; the parties may eliminate this requirement by agreement; the parties should advise the court if they are unable to agree on a mediator; all parties must attend the mediation in person; legal entities must provide a representative with full authority; if there is insurance per Rule 26(a)(1)(D), a representative with full authority must attend in person; the parties and mediator may by agreement waive the requirement of attending in person;
- g. July 1, 2019 - all motions, including motions for summary judgment and any objections to expert testimony must be filed;
- h. August 1, 2019 – responses to motions for summary judgment and any objections to expert testimony.
- i. August 16, 2019 – replies to motions for summary judgment and any objections to expert testimony.

j. Parties desiring entry of a protective order under Rule 26(c) must either (a) request entry of an order in the district court's standard form, which can be found at: www.txnd.uscourts.gov/judges/dgodbey_req.htm or (b) if entry of a protective order in a different form is requested, the motion must (1) explain why the district court's standard form is inadequate in the particular circumstances of the case, and (2) include a redlined version of the requested form showing where it differs from the district court's standard form.

3. The parties shall file all pretrial materials by August 30, 2019. Failure to file pretrial materials may result in dismissal for want of prosecution. Pretrial materials shall include the following:

- a. pretrial order pursuant to LR 16.4;
- b. exhibit lists, witness lists, and deposition designations pursuant to LR 26.2 and Rule 26(a)(3); witness lists should include a brief summary of the substance of anticipated testimony (not just a designation of subject area) and an estimate of the length of direct examination; exhibit lists must include any materials to be shown to the jury, including demonstrative aids; the parties shall comply with Rule 26(a)(3) regarding objections;
- c. proposed jury charge pursuant to LR 51.1 or proposed findings of fact and conclusions of law pursuant to LR 52.1; any objections to the proposed jury charge shall be filed within 14 days thereafter; objections not so disclosed are waived unless excused by the court for good cause;
- d. motions in limine; matters that are not case-specific are strongly discouraged;
- e. requested voir dire questions.

4. The final pretrial conference will be set by separate order or notice. Lead counsel must attend the pretrial conference. The Court will likely impose time limitations for trial at the

pretrial conference. Examination of witnesses will be limited to direct, cross, re-direct, and re-cross. Any questions regarding this Order may be directed to the Court's Judicial Assistant, Donna Hocker Beyer, at 214-753-2700.

SIGNED:

DAVID C. GODBEY
UNITED STATES DISTRICT JUDGE